

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**TEXAS LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, NATIONAL
LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, LEAGUE OF
WOMEN VOTERS OF TEXAS, RALPH
EDELBAUGH, and BARBARA MASON
*Plaintiffs,***

V.

CIVIL ACTION NO.

1:20-cv-1006-RP

**GREG ABBOTT, in his official capacity as Governor of Texas,
RUTH HUGHS, in her official capacity as Texas Secretary of State,
DANA DEBEAUVOIR, in his official capacity as Travis County Clerk,
CHRIS HOLLINS, in his official capacity as Harris County Clerk,
JOHN W. OLDHAM, in his official capacity as Fort Bend County Elections Administrator,
LISA RENEE WISE, in her official capacity as El Paso County Elections Administrator**

Defendants.

**ADVISORY BY CHRIS HOLLINS, IN HIS OFFICIAL CAPACITY AS
HARRIS COUNTY CLERK**

1. Chris Hollins, in his official capacity as Harris County Clerk, files this Advisory and Declaration with the Court to provide factual and technical information necessary for the Court and parties to understand the logistics of planning an election during a pandemic and the steps taken to assure Harris County's 2.4 million registered voters — 14 percent of the total registered voters in Texas — are able to vote safely in this year's general election.

2. The attached Declaration explains the detailed procedures Harris County is using to protect the integrity of the election and the reasons why multiple ballot drop-off locations are essential in a county as populous, diverse, and geographically large as Harris County. Finally, the Declaration explains that the Governor's eleventh-hour decision to close all but one of Harris County's ballot drop off locations has confused and will disenfranchise Harris County voters, who wish to hand-deliver their ballots but cannot safely travel to a single drop-off location or will be forced to wait in a long line a twelve lines are reduced to one.

3. Chris Hollins files this Advisory for the limited purpose explained above and reserves all other rights.

OF COUNSEL:
VINCE RYAN
HARRIS COUNTY ATTORNEY

Respectfully submitted,

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Pro Hac Vice forthcoming

/s/ Susan Hays
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**ATTORNEYS FOR CHRIS HOLLINS, IN
HIS OFFICIAL CAPACITY AS HARRIS
COUNTY CLERK**

CERTIFICATE OF SERVICE

I certify that on the 3rd day of October, 2020, I electronically filed this document with the clerk of court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/Susan Hays

Susan Hays